

EXHIBIT 15

1 B. CHARLES, JR.
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

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4 NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
5 SPRING VALLEY BRANCH; JULIO
CLERVEAUX; CHEVON DOS REIS; ERIC
6 GOODWIN; JOSE VITELIO GREGORIO;
DOROTHY MILLER; HILLARY MOREAU;
7 and WASHINGTON SANCHEZ,
8 Plaintiffs,

Civil Action No.
17 Civ. 8943(CS))JC)

9 vs.
10 EAST RAMAPO CENTRAL SCHOOL
DISTRICT and MARYELLEN ELIA, IN HER
11 CAPACITY AS THE COMMISSIONER OF
EDUCATION OF THE STATE OF NEW
12 YORK,
13 Defendant.

-----x
14
15 VIDEOTAPED DEPOSITION OF BERNARD L. CHARLES, JR.
16 New York, New York
17 October 22, 2018
18
19
20
21
22

23 Reported by:
24 KATHY S. KLEPFER, RMR, RPR, CRR, CLR
25 JOB NO. 149474

1 B. CHARLES, JR.

2 MR. CRAVENS: William Cravens from
3 Morgan, Lewis & Bockius for the defendant.

4 THE VIDEOGRAPHER: Thank you.

5 Will the court reporter please swear 09:58
6 in the witness.

7 * * *

8 BERNARD L. CHARLES, JR., called as a
9 witness, having been duly sworn by a Notary
10 Public, was examined and testified as 09:58
11 follows:

12 EXAMINATION BY

13 MR. NOVAKOVSKI:

14 Q. Can you please state your name for the
15 record. 09:59

16 A. Bernard L. Charles, Jr.

17 Q. And you were just sworn in by the
18 court reporter. Do you understand that you are
19 now under oath and you must testify truthfully,
20 just as you would in front of a Court? 09:59

21 A. Yes.

22 Q. Okay. And are there any reasons you
23 might be unable to testify truthfully today?

24 A. No.

25 Q. Okay. And have you ever been deposed 09:59

1 B. CHARLES, JR.

2 got from the left and from the right. So I'm --
3 I'm good.

4 Q. So the person from the Orthodox and
5 Hasidic community collected your signatures? 12:20

6 A. Yes.

7 Q. And who is this person?

8 A. I don't recall who, what
9 organization -- I don't recall if it was an
10 individual. I don't recall exactly who it was. 12:20
11 I don't recall. But, you know, they said that
12 they would, you know, they liked my, you know,
13 what I stand for, you know, and they will
14 support me.

15 At that time, I found out that Steve 12:20
16 White had decided that they were going to
17 support another slate of candidates, which he
18 never told me. So I -- two people said they
19 would support me. One came through, one didn't.
20 So I just went with the group that did. So it 12:21
21 wasn't anybody specifically that I can give you
22 a name of.

23 Q. Well, you did testify that there was
24 one person from the Orthodox and Hasidic
25 community that approached you, right? 12:21

1 B. CHARLES, JR.

2 A. E-mails? I have no idea.

3 Q. Do you know if they made any calls on
4 your behalf?

5 A. I have no idea. 12:26

6 Q. So they coordinated your campaign,
7 right?

8 A. They -- yes.

9 Q. Did you have to approve anything
10 before it was done? 12:26

11 A. No.

12 Q. So you didn't approve the signs or the
13 fliers?

14 A. No.

15 Q. Okay. Let's turn to the elections. 12:27
16 And you ran on the slate with Mr.
17 Pierre Germain and Ms. MaraLuz Corado, right?

18 A. Yes.

19 Q. And what's your understanding of the
20 term "slate"? 12:27

21 A. Well, people that I knew and I wanted
22 to work with and I felt we would be a good,
23 diverse community, good slate, which was
24 probably one of the best slates that they ever
25 had, because you had a black, a Haitian, and a 12:27

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2 Latino. No slate has ever had that.

3 Q. So the race of the slate was
4 important?

5 A. Very important. 12:27

6 Q. And why is the race of the slate
7 important?

8 A. Because it represented everybody.

9 Q. When you say everybody, what you do
10 mean? 12:27

11 A. It represented the Haitian community,
12 the black community, and the Latino community.

13 Q. Why is it important to represent the
14 Haitian, the black, and the Latino community?

15 A. Because, at that time, we were the 12:28
16 only three people running, and we would
17 represent the public school community.

18 Q. But why is that representation
19 important?

20 MR. CRAVENS: Objection. Asked and 12:28
21 answered.

22 THE WITNESS: Because that's the
23 makeup of our -- of our community.

24 BY MR. NOVAKOVSKI:

25 Q. But why is it important for the 12:28

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2 their race on the board, right?

3 A. Absolutely.

4 Q. Do the elections in East Ramapo
5 require three candidates run together? 12:29

6 A. No, this was -- yeah, I believe so,
7 yeah. Every three -- every year you have three
8 candidates that run.

9 Q. But are the candidates required to run
10 together as a slate? 12:30

11 A. Yes. I'm going to say yes/no. I
12 mean, most people run as a slate. I guess if
13 you want to run as an independent, you can.

14 Q. And you got both Mr. Germain and Ms.
15 Corado to join your slate, right? 12:30

16 A. Yes.

17 Q. Did anyone recommend them to you?

18 A. No, I knew them.

19 Q. So you knew Mr. Germain?

20 A. Yes. 12:30

21 Q. And you knew Ms. Corado?

22 A. Yes.

23 Q. Did anyone ask you to include them on
24 the slate?

25 A. Did anybody ask me? No, nobody asked 12:30

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